

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,  
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DECLARATION OF ROBERT C. GILL IN SUPPORT OF DEFENDANTS' REPLY IN  
SUPPORT OF DEFENDANTS' MOTION IN LIMINE TO EXCLUDE EVIDENCE OF  
PLAINTIFF'S LOST REVENUE, LOST PROFITS, AND LOST PROFIT DAMAGES**

1. I am an attorney at Saul, Ewing, Arnstein & Lehr LLP, counsel for Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"). I was admitted *pro hac vice* in this matter on October 27, 2017.

2. Attached as **Exhibit A** is a true and correct copy of certain excerpts of the Motion to Compel Discovery Hearing before the Honorable Jodi F. Jayne dated September 6, 2018.

3. Attached as **Exhibit B** is a true and correct copy of a document produced by VGT bearing Bates number VGT0055716.

4. Attached as **Exhibit C** is a true and correct copy of a document produced by VGT and introduced at the deposition of James Starr as Starr Ex. 72.

5. Attached as **Exhibit D** is a true and correct copy of a document produced by CHG bearing Bates number CHG0039779.

6. Attached as **Exhibit E** is a true and correct copy of certain excerpts of the Deposition of James Starr dated May 23, 2018.

7. Attached as **Exhibit F** is a true and correct copy of excerpts from the 30(b)(6) Deposition of Don Kovach dated August 2, 2018.

8. Attached as **Exhibit G** is a true and correct copy of a document produced by VGT and introduced at the 30(b)(6) deposition of Don Kovach as Kovach Ex. 3.

9. Attached as **Exhibit H** is a true and correct copy of a PDF version of a native document produced by VGT in discovery and introduced at the 30(b)(6) deposition of Don Kovach as Kovach Ex. 7.

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 14, 2018 in Washington, District of Columbia.

/s/ Robert C. Gill  
Robert C. Gill

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of December, 2018, I caused an unredacted copy of the foregoing Declaration to be served on the following counsel for Plaintiff who have consented to email service, via email:

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/s/ Robert C. Gill  
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